1 2 3 4 5	Harpreet S. Walia, Esq. (SBN 176136) Lisa M. Chapman, Esq. (SBN 118113) ROYSE LAW FIRM, PC 1717 Embarcadero Road Palo Alto, California 94303 Telephone: (650) 813-9700 Facsimile: (650) 813-9777 E-Mail: hwalia@rroyselaw.com lchapman@rroyselaw.com		
6 7	Attorneys for Counterdefendant SANDEEP SOOD and MONSOON ENTERPRISES, INC., a California corporation		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11			
12	NEXTDOOR.COM, INC., a Delaware corporation,	Case No.: 3:12-cv-05667-EMC	
13	Plaintiff,	DECLARATION OF HARPREET S.	
14	v. RAJ ABHYANKER, an individual,	WALIA IN SUPPORT OF COUNTERDEFENDANTS SANDEEP SOOD AND MONSOON ENTERPRISES,	
15			
16	Defendant.	INC'S REQUEST FOR JUDICIAL NOTICE	
17		NOTICE	
18	RAJ ABHYANKER, an individual,		
19	Counterclaimant,	Complaint Filed: November 5, 2012 Countercomplaint Filed: January 10, 2013	
20	v.	D	
21	NEXTDOOR.COM, INC., a Delaware corporation; PRAKASH JANAKIRAMAN, an	Date: May 2, 2013 Time: 1:30 PM	
22	individual; BENCHMARK CAPITAL	Judge: Honorable Edward M. Chen	
23	PARTNERS VII, L.P., a Delaware limited partnership; BENCHMARK CAPITAL		
24	MANAGEMENT CO. VII LLC, a Delaware limited liability company; SANDEEP SOOD,		
25	an individual; MONSOON COMPANY, an		
26	unknown business entity, and DOES 1-50, inclusive,		
27	Counterdefendants.		
28			

DECLARATION OF HARPREET S. WALIA IN SUPPORT OF COUNTERDEFENDANTS SANDEEP SOOD AND MONSOON

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ENTERPRISES, INC.'S REQUEST FOR JUDICIAL NOTICE

I	I
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I, HARPREET S. WALIA, do hereby declare as follows:

- 1. I am an attorney at law and a member of the Royse Law Firm, PC, which represents Counterdefendants Sandeep Sood ("Sood") and Monsoon Enterprises, Inc., a California corporation (erroneously sued herein as Monsoon Company, an unknown business entity) ("Monsoon") (collectively "Counterdefendants") before the Court in this action. I am licensed to practice law in the State of California and admitted before this Court. I have personal knowledge of each of the facts set forth herein, and would competently testify to the truth thereof if called as a witness.
- 2. Attached hereto as **Exhibit 1** is a true and correct copy of Counterclaimant Raj Abhyanker's Complaint for Damages and Equitable Relief for Intentional Interference with Existing and Prospective Economic Advantage, Breach of Confidence, Breach of Contract, Fraud and Conspiracy to Defraud, Constructive Fraud and Aiding and Abetting Constructive Fraud, Unjust Enrichment, Unfair Business Acts and Practices in Violation of Business and Professions Code (Cal.Civ.Code § 17200 et seq.), Violations of the California Corporate Securities Laws, and Misappropriation of Trade Secrets (Cal.Civ.Code § 3426, et seq.), filed on November 10, 2011 in the Superior Court of California, County of Santa Clara, as Civil Case No. 1-10-CV-212924.
- 3. Attached as **Exhibit 2** is a true and correct copy of Counterclaimant Raj Abhyanker's First Amended Complaint for and Misappropriation of Trade Secrets (Cal.Civ.Code § 3426, et seq.), Fraud and Conspiracy to Defraud, Constructive Fraud and Aiding and Abetting Constructive Fraud, Negligent Interference with Existing and Prospective Economic Advantage, Breach of Confidence, Breach of Contract, Breach of Implied Covenant of Good Faith and Fair Dealing, Negligent Misrepresentation, Tortious Interference with Contract, Unjust Enrichment, Unfair Business Acts and Practices in Violation of Business and Professions Code (Cal.Civ.Code § 17200 et seq.), Violations of the California Corporate Securities Laws, and Conversion, filed on December 6, 2011 in the Superior Court of California, County of Santa Clara, as Civil Case No. 1-11-CV-212924.
- 4. Attached as **Exhibit 3** is a true and correct copy of Counterclaimant Raj Abhyanker's November 22, 2006 patent application no. 11/603,442; Publication Date September 20, 2007 entitled "Map Based Neighborhood Search and Community Contribution."

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Declaration is executed this 15th day of March, 2013 at Palo Alto, California.